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Attorneys for Defendants and Cross-
Defendants DIVERSIFIED RESTAURANT
GROUP, LLC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSS LONG,

Plaintiff,

v.

GOOD NITE INN ROHNERT PARK, INC.;
GOOD NITE INN MANAGEMENT, INC.;
CITY OF ROHNERT PARK; ACV GGB
PROPCO, LLC; AKSAN UNITED
FORTUNE, INC.; DIVERSIFIED
RESTAURANT GROUP, LLC;
CRUSTACEAN, INC.; and DOES 1 through
35, Inclusive,

Defendants.

GOOD NITE INN ROHNERT PARK, INC.;
GOOD NITE INN MANAGEMENT,

Cross-Complainants,

v.

ACV GGB PROPCO, LLC; AKSAN UNITED
FORTUNE, INC.; DIVERSIFIED
RESTAURANT GROUP, LLC;
CRUSTACEAN, INC.; DONALD L. DAVIS
AND BEVERLY G. DAVIS, TRUSTEES,
AND ROES 1-20, Inclusive

Cross-Defendants.

Case No. 3:19-cv-00079-RS

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME CROSS-
DEFENDANT DIVERSIFIED
RESTAURANT GROUP, LLC'S TIME
TO RESPOND TO CROSS-
COMPLAINT**

Complaint Filed: January 5, 2019
Cross-Complaint Filed: February 11, 2019

1 Cross-Complainants Good Nite Inn Rohnert Park, Inc. and Good Nite Inn Management
 2 (“Cross-Complainants) and Cross-Defendant Diversified Restaurant Group, LLC (“Cross-
 3 Defendant”), through their undersigned counsel, jointly stipulate to extend the time for Cross-
 4 Defendant to file its responsive pleading to the February 11, 2019 Cross-Complaint (ECF No. 29)
 5 from March 4, 2019, until April 15, 2019.

6 On February 11, 2019, Cross-Complainants filed a Cross-Complaint against Cross-
 7 Defendant and other parties. (ECF No. 29.)

8 On February 28, 2019, Cross-Defendant filed a request for substitution of counsel. (ECF
 9 Nos. 32, 33.) The extension of time to respond to the Cross-Complaint is necessary to allow
 10 Cross-Defendant’s new counsel of record to get up to speed.

11 Besides this current stipulation, the only other stipulations submitted by the Parties in this
 12 lawsuit were to extend Defendants’ time to file their answer to Plaintiff’s Complaint. (ECF Nos.
 13 17, 21.)

14 Pursuant to Civil Local Rule 6-1(a), this extension will not alter the date of any event or
 15 any deadline already fixed by Court order, including the last date by which the joint site
 16 inspection must be conducted pursuant to General Order 56.

17
 18 Dated: March 1, 2019

THE KARLIN LAW FIRM LLP

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 20 By: /s/ L. Scott Karlin
 Attorneys for Defendant and Cross-
 21 Complainants GOOD NITE INN ROHNERT
 PARK, INC. and GOOD NITE INN
 22 MANAGEMENT, INC.

23 Dated: March 1, 2019

JACKSON LEWIS P.C.

24 By: /s/ Janelle Sahouria
 Fraser A. McAlpine
 25 Janelle Sahouria
 Attorneys for Defendant and Cross-
 26 Defendant DIVERSIFIED RESTAURANT
 GROUP LLC
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ATTESTATION

Concurrence in the filing of this document has been obtained from each of the individual(s) whose electronic signature is attributed above.

Dated: March 1, 2019

/s/ Janelle Sahouria

Janelle Sahouria

[PROPOSED] ORDER

The Parties having so stipulated and good cause appearing.

IT IS HEREBY ORDERED that Defendant and Cross-Defendant Diversified Restaurant Group, LLC will have until April 15, 2019 to file its response to the Cross-Complaint of Good Nite Rohnert Park, Inc., and Good Nite Inn Management, Inc., filed on February 11, 2019 (ECF No. 29).

IT IS SO ORDERED.

Dated: _____

Richard Seeborg
United States District Judge

4813-3828-9801, v. 1